REMARKS

Claims 1-30 are pending and stand rejected. That rejection has been made final. Claim 23 has been amended to correct a spelling error. For at least the reasons explained below, the Applicants respectfully request the Examiner's thoughtful reconsideration.

CLAIM REJECTIONS – 35 USC § 102: The Examiner rejected Claims 1-30 under §102 as being anticipated by US Pub. 2002/0128925 to Angeles. A §102 rejection is valid only if the cited reference teaches each and every element recited in a rejected Claim.

Claim 1 is directed to a method for coordinating sessions, and, as amended, recites the following acts:

1. providing, from a second server, a second session interface to a client, the second session interface having instructions to send second association data to a third server; and
2. communicating, from the second server, with the third server to identify activity related to a first session interface utilizing the association data, the first session interface having been previously provided to the client from a first server.

To summarize, Claim 1 recites providing, from a second server, a second session interface to a client. That second session interface has instructions to send second association data to a third server. Claim 1 also recites communicating, from the second server, with the third server. The purpose of that communication is to use the association data to identify activity related to a first session interface. That first session interface was previously provided to the

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client from a first server. In short, Claim 1 directly and indirectly recites the use of three different servers and a client.

Angeles does not teach or suggest any of this. Should the Examiner persist, the Applicants respectfully ask that the Examiner specifically identify passages in Angeles that teach the following:

- providing, from a second server, a second session interface to a client;
- the second session interface having instructions to send second association data to a third server;
- communicating, from the second server, with the third server;
- utilizing the association data to identify activity related to a first session interface; and
- the first session interface having been previously provided to the client from a first server.

Rejecting Claim 1, the Examiner quotes the claim and then makes the following mysterious statement:

> ([0011] - tracking and reporting online activity across a plurality of clients and servers, [0032] - supports multiple session interfaces, [0033], [0034] - identify activity related to the session interface, [0079] - reporting modules)

Nothing in the cited paragraphs or elsewhere in Angeles mention or suggests providing, from a second server, a second session interface to a client where the second session interface has instructions to send second association data to a third server. Nothing in the cited paragraphs or elsewhere in Angeles mention or suggests communicating, from the second server, with the third server to identify activity related to a first session interface utilizing the association data, the first session interface having been previously provided to the client from a first server.

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To illustrate the Examiner's misunderstanding of Claim 1, the cited paragraphs are reproduced below.

[0011] In view of the above problems associated with the related art, in one embodiment, the present invention provides a system and method for tracking and reporting online activity across a plurality of clients and servers that utilizes a real-time content-based network monitoring, data analysis and data extraction to report online activity.

Angeles, paragraph [0011].

[0032] The system and method of the present invention effectively reports on many different types of known online activity and data including but not limited to: purchases from the sale of goods and services online, online shopping cart abandonment, airline ticket reservations, credit card type usage, user account creation, and contest or sweepstake entries. The present invention provides event specific attributes such as purchase amounts, cart item names, travel dates, e-mail addresses and zip codes. Traditional types of online activity data such as page view counts and session durations that are currently reported by existing prior art systems are likewise provided.

[0033] According to a preferred embodiment of the present invention, ETS employs a modular application architecture in which major software components are delineated across discrete functions. The modular architecture allows for the introduction of new functionality without imposing a great development burden. It also allows for interchanging different modules, thus adding to the flexibility of the system. FIG. 1 is a schematic diagram depicting the Event Tracking System (ETS) application architecture according to an embodiment of the present invention. The application architecture 100 comprises a data capture module 110, an identification module 120, an extraction module 130, an analysis module 140, a reporting module 150, a profile management module 160 and a storage medium 170.

[0034] According to the application architecture of the present invention, the data capture module 110 traps client-server HTTP transmissions and records them on a storage device. The data capture module is responsible for: providing a means by which it can intercept client-server HTTP transmissions; decrypting SSL encrypted transmissions when applicable; recording the entire, non-encrypted HTTP request and response on a storage device; and recording other data related to the transmission, such as the

Identity of the requesting client, the URL for the request, and the time at which the transmission occurred.

Angeles, paragraphs [0032] – [0034].

[0079] According to the application architecture of the present invention, and referring back to FIG. 1, the reporting module 150 is composed of at least two interfaces, a Web-based interface 151 and an XML feed 152 that report online activity in a particular format. The Web-based interface is an interactive graphical user interface that returns report query results in HTML format. The XML feed is an interface that returns report query results in XML format. In a preferred embodiment, the Web-interfaces employ permissions-based access control, wherein authorized users are authenticated with by a user name and password combination. The reporting interfaces preferably provide access to five major reports: a session detail report, an event detail report, a purchase detail report and a purchase summary report.

Angeles, paragraph [0079].

Nothing in these paragraphs mentions or suggests the direct and/or indirect use of a client, a first server, a second server, and a third server as recited in Claim 1. Nothing in the paragraphs mentions or suggests sending a second session interface to the client from the second server where that session interface has instructions to send association data to the third server. Nothing in the paragraphs mentions or suggests communicating, from the second server, with the third server utilizing the association data to identify activity related to a first session interface that was previously provided to the client from a first server.

For at least these reasons, Claim, 1 is patentable over Angeles as are Claims 2-4 which depend from Claim 1

Claim 5 is directed to a method for coordinating sessions, and as amended recites the following acts:

1. providing, from a first server, a first session interface to a client, the first session interface having instructions to send first association data to a

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third server;

2. the client sending the first association data to the third server;

3. providing, from a second server, a second session interface to the client, the second session interface having instructions to send second association data to the third server;

4. the client sending the second association data to the third server; and

5. communicating, from the second server, with the third server utilizing the first and second association data to identify activity related to the first session interface.

As above with respect to claim 1, Angeles does not teach or suggest providing, from a second server, a second session interface to a client where the second session interface has instructions to send second association data to a third server. Nothing in the cited paragraphs or elsewhere in Angeles mention or suggests communicating, from the second server, with the third server to identify activity related to a first session interface utilizing the association data, the first session interface having been previously provided to the client from a first server. For at least the same reasons Claim 1 is patentable over Angeles, so are Claim 5 and Claims 6-11 which depend from Claim 5.

Furthermore, Angeles does not teach or suggest providing, from a first server, a first session interface to a client, the first session interface having instructions to send first association data to a third server. For this element, the Examiner cited Angeles, paragraph [0037] which has been reproduced below.

> [0037] The rewritten URL causes the browser to send a request to URL-proxy. The proxy then extracts the original URL from the path of the rewritten URL, sends a request to the original host, receives the response from the original host and serves the response data to the browser. If the response data is in the form of HTML code, the URL-proxy first rewrites all URLs embedded in the HTML code in the manner described above before sending the response back to the browser. In this manner, the URL-proxy is able to intercept further requests initiated by the browser as a result of the user clicking on hyperlinks that reference the rewritten URLs.

Angeles, paragraph [0037].

Angeles describes a system for capturing transmissions between a single client and a single server for the purpose of reporting online activity. Angeles, paragraph [0035]. In doing so, Angeles employs an URL proxy that rewrites URLs so that the original URL is encoded as part of the rewritten proxy URL. Angeles, paragraph [0036]. Angeles, paragraph [0037] merely describes that a request from a client to a rewritten URL is sent to an URL proxy. The URL proxy forwards the request to the original URL. The URL proxy receives responses, rewrites the URLs in those responses, and forwards the responses back to the client.

All interfaces provided to Angeles' client are provided by the URL proxy. Because each URL in each interface returned to the client has been rewritten to reference the URL proxy, none of those interfaces include instruction to send data anywhere but to the URL proxy. As a consequence, Angeles does not teach or suggest providing, from a first server, a first session interface to a client where that first session interface has instructions to send first association data to a third server. Angeles' client only receives data from and sends data to the URL proxy.

For at least these additional reasons, Claim 5 and Claims 6-11 which depend from Claim 5, are patentable over Angeles.

Claim 12 is directed to a session coordinating method and recites the following acts:

1. providing from a first server a first web page to a client the first web page having instructions to request a web bug from a third server;
2. from the client, requesting the web bug sending a cookie and an URL for the first web page to the third server;
3. providing from a second server a second web page to a client, the second

web page having instructions to request the web bug from the third server;

4. from the client, requesting the web bug sending the cookie and an URL for the second web page to the third server;

5. saving the cookie and the URL for the first web page as an entry in an association table maintained from the third server;

6. saving the cookie and the URL for the second web page as an entry in the association table;

7. from the second server, providing the URL for the second web page to the third server, querying the association table for the cookie in the entry containing the URL for the second web page;

8. from the second server, identifying other entries in the association table containing that cookie;

9. from the second server, identifying, from those entries, the entry containing the URL for the first web page; and

10. identifying activity relating to the first web page using that URL for the first web page.

Angeles does not teach the use of web bugs to achieve that which is recited in Claim 12. Angeles' only reference to web bugs is in paragraph [0010] reproduced as follows.

> [0010] Still further prior art systems for reporting online activity rely on the integration or insertion of JavaScript or transparent images (also known as clear gifs, Web bugs or beacons) in each Web page for which transaction activity is to be reported. These systems have similar limitations to the aforementioned affiliate network systems. These systems require the Web site operator to modify or program specific Web pages within a Web site in order to transmit data regarding transactions. As with affiliate network systems, these systems do not provide an independent analysis of the reported data.

That paragraph mentions nothing of web bugs other than that some prior art systems utilize web bugs for reporting online activity. Claim 12 is directed to a

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session coordination method in which activity related to a first web page served by a first server to a client is identified from a second servers access to a third server.

As mentioned above with respect to Claim 1, Angeles mentions nothing of the direct and/or indirect use of a client, a first server, a second server, and a third server in the manner recited by 12. Angeles simply describes an URL proxy that intercepts and monitors traffic between a client and a server. Angeles mentions nothing of using a third server to coordinate a session between a client and a first server with a session between the client and a second server in the manner recited by Claim 12.

For at least these reasons, Claim 12 is patentable over Angeles.

Claim 13 is directed to a computer readable medium having instructions for implementing the method of Claim 1. For at least the same reason Claim 1 is patentable, so are Claim 13 and Claims 14-16 which depend from Claim 13.

Claim 17 is directed to a computer readable medium having instructions for implementing the method of Claim 5. For at least the same reason Claim 5 is patentable, so are Claim 17 and Claims 18-23 which depend from Claim 17.

Claim 24 is directed to a computer readable medium having instructions for implementing the method of Claim 12. For at least the same reason Claim 12 is patentable, so is Claim 24.

Claim 25 is directed to a system reciting elements for implementing the method of Claim 1. For at least the same reason Claim 1 is patentable, so are Claim 25 and Claim 26 which depends from Claim 25.

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Claim 27 is directed to a system reciting elements for implementing the method of Claim 5. For at least the same reason Claim 5 is patentable, so are Claim 27 and Claim 28 which depends from Claim 27.

Claim 29 is directed to a system reciting elements for implementing the method of Claim 12. For at least the same reason Claim 12 is patentable, so is Claim 29.

Claim 30 is directed to a system reciting means for implementing the method of Claim 1. For at least the same reason Claim 1 is patentable, so is Claim 30.

CONCLUSION: The foregoing is believed to be a complete response to the outstanding Office Action. Claims 1-30 are all felt to be in condition for allowance. Consequently, early and favorable action allowing these claims and passing the application to issue is earnestly solicited. The foregoing is believed to be a complete response to the outstanding Office Action.

Respectfully submitted,

Gregory Eugene Perkins.

By _____

Jack H. McKinney
Reg. No. 45,685

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